

December 18, 2024

Ministry of Information and Communications (MIC)
18 Nguyen Du Str. Hanoi - Vietnam

Re: Draft Circular amending and supplementing a number of articles of Circular No. 08/2021/TT-BTTTT of the Minister of Information and Communications regulating the list of radio equipment exempted from radio frequency use licenses, technical conditions and accompanying exploitation, dated October 2024

Dear Officials,

The Dynamic Spectrum Alliance (DSA¹) respectfully submits these comments in response to the Ministry of Information and Communications (MIC) ‘**Draft Circular amending and supplementing a number of articles of Circular No. 08/2021/TT-BTTTT of the Minister of Information and Communications regulating the list of radio equipment exempted from radio frequency use licenses, technical conditions and accompanying exploitation, dated October 2024**’.

The DSA commends the MIC for conducting this public consultation and opening the 5925 – 6425 MHz frequency band for license-exempt access. Vietnam joins a growing list of countries worldwide that are adopting policies to facilitate access by Wireless Access Systems, including Radio Local Area Networks (WAS/RLAN), to additional spectrum that will support the latest technology for wireless networks, including Wi-Fi 6E and Wi-Fi 7. The DSA strongly believes that increasing spectrum allocations for Wi-Fi devices will enhance Vietnam’s digital infrastructure and enable businesses and consumers to take advantage of next generation wireless connectivity and digital applications.

Part 1 - Comments on the proposed allocation of the lower 500 MHz of the 6 GHz band (5925 MHz – 6425 MHz) for license-exempt RLAN use.

DSA recognizes that at WRC-23, Vietnam joined countries in Region 3 in identifying 100 MHz (7025 – 7125MHz) for IMT and at the same time, expressed support for identifying the

¹ The DSA is a global, cross-industry, not for profit organization advocating for laws, regulations, and economic best practices that will lead to more efficient utilization of spectrum, fostering innovation and affordable connectivity for all. Our membership spans multinationals, small-and medium-sized enterprises, as well as academic, research and other organizations from around the world all working to create innovative solutions that will benefit consumers and businesses alike by making spectrum abundant through dynamic spectrum sharing. A full list of DSA members is available on the DSA’s website at www.dynamicspectrumalliance.org/members.

6425 – 7125 MHz band for IMT. However, before and after WRC-23 some countries in all three ITU Regions permitted license-exempt use across the entire 6 GHz band (5925-7125 MHz). The use of the entire 6 GHz band for Wi-Fi is perfectly aligned with the results of the last World Radiocommunications Conference (WRC-23) and the Radio Regulations. Note 5.457E, explicitly recognizes that the 6 GHz frequency bands are also used for the implementation of WAS/RLANs². With that international context consideration, DSA recommends that MIC consider opening the 6425 – 7025 MHz frequency range for WAS/RLANs use in the future. That would support the 320 MHz wide channels enabled by Wi-Fi 7 and users in Vietnam will then take advantage of the available capacity of the fiber optic infrastructure that was deployed over the past decade. With wider channels, access points will be able to support extremely high-capacity bandwidths (with speeds of 1 Gbps or more), enabling vital applications for the 21st century.

Part 2 – Comments on the proposed technical requirements and Standard Power Applications

The DSA supports the MIC’s proposal to authorize RLAN Low Power Indoor (LPI) and Very Low Power (VLP) but recommends the adoption of technical parameters aligned with international trends to take advantage of economies of scale, reducing the cost for consumers in Vietnam. DSA recommends that MIC authorize a maximum EIRP of 24 dBm for LPI devices and to authorize a maximum EIRP of 17 dBm for VLP devices. The maximum EIRP of 14 dBm assumes a maximum 160 MHz channel bandwidth and will not fully maximize the capability of Wi-Fi 7 devices being introduced to market that can support 320 MHz channels.

In addition to enabling LPI and VLP uses, the DSA also encourages MIC to consider Standard Power device authorization in the 6 GHz band. Standard Power devices propagate farther, enabling greater download and upload speeds on end-user devices. If the Ministry wishes to implement standard power applications, the U.S. rules, located in FCC Part 15.407 could be considered a reference. It sets a maximum 36 dBm EIRP and a maximum power spectral density of 23 dBm/MHz. It is worth noting that for outdoor devices, the maximum EIRP is limited to 125 mW (21 dBm) at any elevation angle above 30 degrees as measured from the horizon. Standard Power and outdoor WAS/RLAN devices are able to operate in the 6 GHz band under a spectrum-sharing regime known as Automated Frequency Coordination (AFC). Spectrum sharing is an increasingly used tool by authorities around the world to balance spectrum allocations and ensure new commercial entrants and incumbents can co-exist in a band without harmful interference.

The DSA appreciates the opportunity to comment on this public consultation. We look forward to working with the MIC on the next steps and providing any technical information that might be useful.

² **5.457E** The frequency bands 6 425-7 125 MHz in Region 1 and 7 025-7 125 MHz in Region 3 are identified for use by administrations wishing to implement the terrestrial component of International Mobile Telecommunications (IMT). This identification does not preclude the use of these frequency bands by any application of the services to which they are allocated and does not establish priority in the Radio Regulations. Resolution **220 (WRC-23)** applies. The frequency bands are also used for the implementation of wireless access systems (WAS), including radio local area networks (RLANs). (WRC-23)

Finally, the DSA would support the initiative of some of our members to organize a workshop on Wi-Fi technology early next year.

Respectfully submitted,



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